



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

WK/ABS:SWR  
F. #2018R0124

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 26, 2018

By FedEx and ECF

Larry H. Krantz, Esq.  
Lisa Cahill, Esq.  
Krantz & Berman LLP  
747 Third Avenue, 32nd Floor  
New York, New York 10017

Re: United States v. Gary Peresiper  
Criminal Docket No. 18-280 (SJ)

Dear Counsel:

Enclosed please find one disc (the "Production") containing additional discovery materials in the above-referenced case. The Production has been encrypted, and the password will be sent to you separately by email. The contents of the Production have been designated "confidential" under the terms of the Protective Order in the case. The contents of the Production are set forth below.

The Production includes folders containing the following documents, which are labeled accordingly:

- 1) Corporate Records from the New York Department of State;
- 2) Financial Records from JPMorgan Chase; and
- 3) Financial Records from TD Bank.

\* \* \*

The government hereby renews its request for reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, data, photographs, tapes, tangible objects, or copies or portions thereof, that are in the defendant's

possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely on at trial, and (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely upon at trial, or that were prepared by a witness whom the defendant intends to call at trial.

The government also renews its request that the defendant disclose prior statements of witnesses who will be called by the defendant to testify. See Fed. R. Crim. P. 26.2. In order to avoid unnecessary delays, the government requests that the defendant have copies of those statements available for production to the government no later than the commencement of trial.

The government also renews its request that the defendant disclose a written summary of testimony that the defendant intends to use as evidence at trial under Rules 702, 703, and 705 of the Federal Rules of Evidence. The summary should describe the opinions of the witnesses, the bases and reasons for the opinions, and the qualification of the witnesses.

Pursuant to Fed. R. Crim. P. 12.3, the government hereby renews its demand for written notice of the defendant's intention, if any, to claim a defense of actual or believed exercise of public authority, and also demands the names and addresses of the witnesses upon whom the defendant intends to rely in establishing the defense identified in any such notice.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Sarah Wilson Rocha  
Sarah Wilson Rocha  
Assistant U.S. Attorney  
(718) 254-6366

Enclosures

cc: Clerk of the Court (SJ) (by ECF) (without enclosures)